

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: CHRISTINE MARIE POMPEI Debtor	:	CHAPTER 13
	:	
	:	
JACK N. ZAHAROPOULOS	:	
STANDING CHAPTER 13 TRUSTEE	:	
Movant	:	
	:	
vs.	:	
	:	
CHRISTINE MARIE POMPEI	:	
Respondent	:	CASE NO. 1-24-bk-00746

TRUSTEE’S OBJECTION TO FIRST AMENDED CHAPTER 13 PLAN

AND NOW, this 12<sup>th</sup> day of July 2024, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)’ plan for the following reason(s):

1. Debtor(s)’ Plan violates 11 U.S.C. § 1322(a)(2) in that the Debtor(s) has not provided for full payment, in deferred cash payments, of all claims entitled to priority under 11 U.S.C. § 507. Specifically, the Plan does not provide for priority taxes in Claim 10-1.

WHEREFORE, Trustee alleges and avers that debtor(s) plan cannot be confirmed, and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

BY: /s/Agatha R. McHale  
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 12<sup>th</sup> day of July 2024, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

PAUL MURPHY-AHLES ESQUIRE  
DETHLEFS, PYKOSH & MURPHY  
2132 MARKET STREET  
CAMP HILL, PA 17011-

/s/Tammy Life  
Office of Jack N. Zaharopoulos  
Standing Chapter 13 Trustee